

# EXHIBIT 11

## NOTICE OF TERMINATION

### “FALCON”

To: Marvel Entertainment, LLC  
Marvel Worldwide, Inc.  
Marvel Property, Inc.  
Marvel Characters, Inc.  
1290 Avenue of the Americas  
New York, NY 10104  
Attn: John Turitzin, Chief Counsel  
Eli Bard, Deputy Chief Counsel

Marvel Studios, LLC  
MVL Rights, LLC  
MVL Development, LLC  
Marvel Characters, Inc.  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: David Galluzzi, Chief Counsel

The Walt Disney Company  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: Alan Braverman, General Counsel

Marvel Animation Inc.  
623 Circle Seven Drive  
Glendale, CA 91201  
Attn: Legal Department

PLEASE TAKE NOTICE that pursuant to Section 304(c) of the United States Copyright Act (17 U.S.C. § 304(c)) and the regulations issued thereunder by the Register of Copyrights, 37 C.F.R. § 201.10, Nanci Solo and Erik Colan, the children, and Rachel Waldman, the biological granddaughter, of the deceased author Eugene J. Colan, hereby terminate all pre-January 1, 1978 exclusive or non-exclusive grants of the transfer or license of the renewal copyright(s) in and to the illustrated comic book stories, many of which feature the character Falcon (a.k.a. Samuel Wilson), authored or co-authored by Eugene J. Colan (a.k.a. Gene Colan) and published in the CAPTAIN AMERICA comic book issues, all as set forth below<sup>1</sup>:

1. The names and addresses of the grantees and/or successors in title whose rights are being terminated are as follows: Marvel Entertainment, LLC, Marvel Worldwide, Inc., Marvel Property, Inc., Marvel Characters, Inc., 1290 Avenue of the Americas, New York, NY 10104; Marvel Studios, LLC, MVL Rights, LLC, MVL Development, LLC, Marvel Characters, Inc., 500

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<sup>1</sup> The terminated grantees listed herein were previously served on June 22, 2021 with a notice of termination under 17 U.S.C. § 304(c) regarding the Works set forth herein below. This alternate notice of termination is served out of an abundance of caution in the event that the prior notice is deemed ineffective.

South Buena Vista Street, Burbank, CA 91521; The Walt Disney Company, 500 South Buena Vista Street, Burbank, CA 91521; and Marvel Animation Inc., 623 Circle Seven Drive, Glendale, CA 91201. Pursuant to 37 C.F.R. § 201.10(d), service of this notice is being made by First Class Mail, postage pre-paid to the above grantees or successors at the addresses shown.

2. The copyrighted work(s) to which this Notice of Termination apply(ies) (individually, the “Work”; collectively, the “Works”) are the illustrated comic book story(ies), many of which feature the character Falcon (a.k.a. Samuel Wilson), authored or co-authored by Eugene J. Colan (a.k.a. Gene Colan),<sup>2</sup> along with all the characters, story elements, and/or indicia appearing therein, which stories were published and embodied in the comic book issues identified as follows:

<u>Title</u>	<u>Copyright Claimant</u> <sup>3</sup>	<u>Date</u>	<u>Copyright</u>
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<sup>2</sup> This Notice of Termination also applies to all material authored or co-authored by Eugene J. Colan (in any and all medium(s), whenever created) that was reasonably associated with the Works and was registered with the United States Copyright Office and/or published within the termination time window, as defined by 17 U.S.C. § 304(c), and the effective date of this Notice of Termination. This Notice of Termination likewise includes any character, story element, or indicia reasonably associated with the Works including, without limitation, Falcon (a.k.a. Samuel Wilson), Redwing, Captain America (a.k.a. Steve Rogers), Red Skull, Eric Gruning, Angelo Baldini, Ivan Krushki, Franz Cadavus, Iron-Hand Hauptmann, General Ching, MODOK, Rick Jones, Sharon Carter, Nick Fury, Dum-Dum Dugan, Mart Baker, Agent R-1 (“Grizzly”), Agent R-2 (“Mike”), Professor Paul Fosgrave, Man-Brute, Silas X. Cragg, Abraham Erskine, Heinz Kruger General Phillips, Jarvis, Yellowjacket, Wasp, Black Panther, Vision, Robert Dietzel, Scorpion, Jasper Sitwell, Suprema, Scarbo, J. Jonah Jameson, Tony Stark, “Aces” Wild, Agent A-12, Agent A-14, Mandarin, Dr. Robert Hoskins, Diamond Head, Maggia, Android X-4, Dr. Ralph Ryder, Joe Robertson, Bucky Barnes, Heinrich Zemo, King Hassab of Irabia, The Hood, Batroc the Leaper, Whirlwind, Porcupine, Hulk, Spider-Man (a.k.a. Peter Parker), Doctor Doom, Scientist Supreme, Stone-Face, Sarah Wilson-Casper, Jody Casper, the Monster Ape, Prince, Mole Man, the Moloids, and Harry Osborn. Every reasonable effort has been made to find and list herein all such material. Nevertheless, if any such material has been omitted, such omission is unintentional and involuntary, and this Notice also applies to each and every such omitted material.

<sup>3</sup> Pursuant to 37 C.F.R. § 201.10(b)(1)(iii), this Notice of Termination includes the name of at least one author of each Work to which this Notice of Termination applies. The listing herein of any corporation as copyright claimant is done per Copyright Office records, and is not to be construed as an admission that any given work is or was a “work made for hire,” nor is anything else herein to be construed as any such admission. Nothing contained in this Notice of Termination shall be construed to in any way limit or waive any right or remedy that Nanci Solo, Erik Colan and/or Rachel Waldman, may have, at law or in equity, with respect to the subject matter hereof, all of which is hereby expressly reserved.

		<u>Copyright Secured</u>	<u>Reg. No.</u>
<i>Captain America</i> Vol. 1, No. 117	Magazine Management Co., Inc. and Marvel Comics Group	5/13/1969	B532114
<i>Captain America</i> Vol. 1, No. 118	Magazine Management Co., Inc. and Marvel Comics Group	6/10/1969	B532062
<i>Captain America</i> Vol. 1, No. 119	Magazine Management Co., Inc. and Marvel Comics Group	7/8/1969	B532117
<i>Captain America</i> Vol. 1, No. 120	Magazine Management Co., Inc. and Marvel Comics Group	8/12/1969	B533818
<i>Captain America</i> Vol. 1, No. 121	Magazine Management Co., Inc. and Marvel Comics Group	9/9/1969	B545951
<i>Captain America</i> Vol. 1, No. 122	Magazine Management Co., Inc. and Marvel Comics Group	10/14/1969	B545968
<i>Captain America</i> Vol. 1, No. 123	Magazine Management Co., Inc. and Marvel Comics Group	11/11/1969	B549540
<i>Captain America</i> Vol. 1, No. 124	Magazine Management Co., Inc. and Marvel Comics Group	12/9/1969	B557545
<i>Captain America</i> Vol. 1, No. 125	Magazine Management Co., Inc. and Marvel Comics Group	1/13/1970	B567218
<i>Captain America</i> Vol. 1, No. 126	Magazine Management Co., Inc. and Marvel Comics Group	2/10/1970	B576035
<i>Captain America</i> Vol. 1, No. 127	Magazine Management Co., Inc. and Marvel Comics Group	3/10/1970	B578594
<i>Captain America</i> Vol. 1, No. 128	Magazine Management Co., Inc. and Marvel Comics Group	4/7/1970	B586684
<i>Captain America</i> Vol. 1, No. 129	Magazine Management Co., Inc. and Marvel Comics Group	5/5/1970	B598586
<i>Captain America</i> Vol. 1, No. 130	Magazine Management Co., Inc. and Marvel Comics Group	6/9/1970	B598589
<i>Captain America</i> Vol. 1, No. 131	Magazine Management Co., Inc. and Marvel Comics Group	7/7/1970	B609524
<i>Captain America</i> Vol. 1, No. 132	Magazine Management Co., Inc. and Marvel Comics Group	8/4/1970	B612392
<i>Captain America</i> Vol. 1, No. 133	Magazine Management Co., Inc. and Marvel Comics Group	9/8/1970	B630153; B630214
<i>Captain America</i> Vol. 1, No. 134	Magazine Management Co., Inc. and Marvel Comics Group	10/6/1970	B630191
<i>Captain America</i> Vol. 1, No. 135	Magazine Management Co., Inc. and Marvel Comics Group	11/3/1970	B631976
<i>Captain America</i> Vol. 1, No. 136	Magazine Management Co., Inc. and Marvel Comics Group	12/15/1970	B638024
<i>Captain America</i> Vol. 1, No. 137	Magazine Management Co., Inc. and Marvel Comics Group	1/12/1971	B648901

3. The grant(s) and/or transfer(s) to which this Notice of Termination applies was (were) made in that (those) certain copyright assignment(s) on the back of the check(s) issued by Marvel Entertainment, LLC's ("Marvel") predecessor company(ies) to Eugene J. Colan, regarding the above-listed Works, which was (were) dated on or about the time of the publication of such Works, as well as any other grant(s) regarding the Works by Eugene J. Colan to Marvel's predecessor(s).<sup>4</sup>

4. The effective date of termination for each respective Work shall be as follows:

<u>Title:</u>	<u>Effective Date of Termination:</u>
<i>Captain America</i> Vol. 1, No. 117	May 14, 2025
<i>Captain America</i> Vol. 1, No. 118	June 11, 2025
<i>Captain America</i> Vol. 1, No. 119	July 9, 2025
<i>Captain America</i> Vol. 1, No. 120	August 13, 2025
<i>Captain America</i> Vol. 1, No. 121	September 10, 2025
<i>Captain America</i> Vol. 1, No. 122	October 15, 2025
<i>Captain America</i> Vol. 1, No. 123	November 12, 2025
<i>Captain America</i> Vol. 1, No. 124	December 10, 2025
<i>Captain America</i> Vol. 1, No. 125	January 14, 2026
<i>Captain America</i> Vol. 1, No. 126	February 11, 2026
<i>Captain America</i> Vol. 1, No. 127	March 11, 2026
<i>Captain America</i> Vol. 1, No. 128	April 8, 2026
<i>Captain America</i> Vol. 1, No. 129	May 6, 2026
<i>Captain America</i> Vol. 1, No. 130	June 10, 2026
<i>Captain America</i> Vol. 1, No. 131	July 8, 2026
<i>Captain America</i> Vol. 1, No. 132	August 5, 2026
<i>Captain America</i> Vol. 1, No. 133	September 9, 2026
<i>Captain America</i> Vol. 1, No. 134	October 7, 2026
<i>Captain America</i> Vol. 1, No. 135	November 4, 2026
<i>Captain America</i> Vol. 1, No. 136	December 16, 2026
<i>Captain America</i> Vol. 1, No. 137	January 13, 2027

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<sup>4</sup> This Notice of Termination also applies to each and every grant or alleged grant by Eugene J. Colan of rights under copyright in and to the Works that falls within the applicable termination time window (defined by 17 U.S.C. § 304(c) and the effective date of this Notice of Termination). Every reasonable effort has been made to find and list herein every such grant and/or transfer. Nevertheless, if any such grant and/or transfer has been omitted, such omission is unintentional and involuntary, and this Notice of Termination applies as well to each and every such omitted grant and/or transfer.

5. Eugene J. Colan died on June 23, 2011. He is survived by his children, Nanci Solo and Erik Colan, biological grandchild, Rachel Waldman (the daughter of his deceased biological child, Valerie Waldman) and biological child, Jill Kubicki. Together Nanci Solo, Erik Colan and Rachel Waldman constitute more than one-half of Eugene J. Colan's termination interest. Accordingly, this Notice has been signed by all persons needed to terminate the grant(s) identified herein under 17 U.S.C. § 304(c).

Dated: November 15, 2022

TOBEROFF & ASSOCIATES, P.C.



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Marc Toberoff

23823 Malibu Road, Suite 50-363  
Malibu, CA 90265  
Tel: (310) 246-3333

As counsel for and on behalf of Nanci Solo,  
Erik Colan and Rachel Waldman

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true copy of the foregoing document described as  
NOTICE OF TERMINATION to be served this 15<sup>th</sup> day of November, 2022, by First Class  
Mail, postage prepaid, upon each of the following:

To: Marvel Entertainment, LLC  
Marvel Worldwide, Inc.  
Marvel Property, Inc.  
Marvel Characters, Inc.  
1290 Avenue of the Americas  
New York, NY 10104  
Attn: John Turitzin, Chief Counsel  
Eli Bard, Deputy Chief Counsel

Marvel Studios, LLC  
MVL Rights, LLC  
MVL Development, LLC  
Marvel Characters, Inc.  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: David Galluzzi, Chief Counsel

The Walt Disney Company  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: Alan Braverman, General Counsel

Marvel Animation Inc.  
623 Circle Seven Drive  
Glendale, CA 91201  
Attn: Legal Department

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15<sup>th</sup>  
day of November, 2022, at Malibu, California.

  
\_\_\_\_\_  
Jaymie Parkkinen  
Toberoff & Associates, P.C.  
23823 Malibu Road, Suite 50-363  
Malibu, CA 90265

Counsel for Nanci Solo, Erik Colan and  
Rachel Waldman

## NOTICE OF TERMINATION

### “BLADE”

To: Marvel Entertainment, LLC  
Marvel Worldwide, Inc.  
Marvel Property, Inc.  
Marvel Characters, Inc.  
1290 Avenue of the Americas  
New York, NY 10104  
Attn: John Turitzin, Chief Counsel  
Eli Bard, Deputy Chief Counsel

Marvel Studios, LLC  
MVL Rights, LLC  
MVL Development, LLC  
Marvel Characters, Inc.  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: David Galluzzi, Chief Counsel

The Walt Disney Company  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: Alan Braverman, General Counsel

Marvel Animation Inc.  
623 Circle Seven Drive  
Glendale, CA 91201  
Attn: Legal Department

PLEASE TAKE NOTICE that pursuant to Section 304(c) of the United States Copyright Act (17 U.S.C. § 304(c)) and the regulations issued thereunder by the Register of Copyrights, 37 C.F.R. § 201.10, Nanci Solo and Erik Colan, the children, and Rachel Waldman, the biological granddaughter, of the deceased author Eugene J. Colan, hereby terminate all pre-January 1, 1978 exclusive or non-exclusive grants of the transfer or license of the renewal copyright(s) in and to the illustrated comic book stories, many of which feature the character Blade (a.k.a. Eric Brooks), authored or co-authored by Eugene J. Colan (a.k.a. Gene Colan) and published in the TOMB OF DRACULA comic book issues, all as set forth below<sup>1</sup>:

1. The names and addresses of the grantees and/or successors in title whose rights are being terminated are as follows: Marvel Entertainment, LLC, Marvel Worldwide, Inc., Marvel Property, Inc., Marvel Characters, Inc., 1290 Avenue of the Americas, New York, NY 10104;

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<sup>1</sup> The terminated grantees listed herein were previously served on June 22, 2021 with a notice of termination under 17 U.S.C. § 304(c) regarding the Works set forth herein below. This alternate notice of termination is served out of an abundance of caution in the event that the prior notice is deemed ineffective.



Marvel Studios, LLC, MVL Rights, LLC, MVL Development, LLC, Marvel Characters, Inc., 500 South Buena Vista Street, Burbank, CA 91521; The Walt Disney Company, 500 South Buena Vista Street, Burbank, CA 91521; and Marvel Animation Inc., 623 Circle Seven Drive, Glendale, CA 91201. Pursuant to 37 C.F.R. § 201.10(d), service of this notice is being made by First Class Mail, postage pre-paid to the above grantees or successors at the addresses shown.

2. The copyrighted work(s) to which this Notice of Termination apply(ies) (individually, the “Work”; collectively, the “Works”) are the illustrated comic book story(ies), many of which feature the character Blade (a.k.a. Eric Brooks), authored or co-authored by Eugene J. Colan (a.k.a. Gene Colan),<sup>2</sup> along with all the characters, story elements, and/or indicia

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<sup>2</sup> This Notice of Termination also applies to all material authored or co-authored by Eugene J. Colan (in any and all medium(s), whenever created) that was reasonably associated with the Works and was registered with the United States Copyright Office and/or published within the termination time window, as defined by 17 U.S.C. § 304(c), and the effective date of this Notice of Termination. This Notice of Termination likewise includes any character, story element, or indicia reasonably associated with the Works including, without limitation, Blade (a.k.a. Eric Brooks), Jeanie Ovington, Abraham van Helsing, Fritz Burgeister, Danny Summers, Carl von Harbou, Ilsa Strangeway, Inspector Chelm, Godfrey Langston, Lenore DeCade, the Moorlands Monster, Lord Dering, Lady Dering, Buckley Grainger, Dr. Heinrich Mortte, Adrian Mortte, Corker Haller, Gladys Fulton, Jason Faust, Oliver Gordon, Molodowi, Henry Laswell, Duncan Corley, Helen Cantler, James Jackson, Shivvey Martin, Gordo Brown, Horatio Toombs, Marie Komph, Theresa Beare, Henry Bonney, Paul Beare, Peter Vornik, Ulsa Vornik, Petra Vornik, Leonid Korsak, Katerina Stenski, Marcus Fydora, Shiela Whittier, Alestar Dunwick, Lilith Drake, Henrietta Dunwick, Rodney Dunwick, Caroline Bascombe, Hannibal King, Adrienne Brown Walters, Fred Walters, David Eshcol Chastity Jones, Joshua Eschol, C’Thunda, King Kull, Mae Li, Adri Nital, Beverly Gable, Lyza Strang, Archibald Strang, Melanie Knight, Marcia Knight, Paul Knight, Kuai Hua, Ogun, Azi, Musenda, Orji, Mary-Beth Singleton, Lord Arthur Singleton, Brother Voodoo, Daniel Drumm, Daphne von Wilkinson, Jackson Hardy, Tilly Beatering, Martin Beatering, Ken Mitchell, Jack Bolt, Winston Twindle, Angie Rogers, William Perry, Joe Petri, Jack Ownes, Capt. Sid Greenely, Harold H. Harold, Aurora Rabinowitz, Juno, Janet Golin, Stu Summers, Elizabeth Harker, Jonathan Harker, Edith Harker, Quincy Harker, Clifton Graves, Dracula (a.k.a. Vlad Dracula), Garbiel Trulaine, Charlie O’Casey, Martin Scampt, Lord Turac, Frank Drake, Rachel van Helsing, Taj Nital, Elizabeth Langley, Saint, Safron Caulder, Cecile Parker, Deacon Frost, Tara Brooks, Jasper O’Connor, Josiah Dawn, Lucas Brand, Professor Morgo, Dr. Sun, Kitty, Orphelus, Turac, Maria Dracula, Jacques Granet, Ludwig Gruber, Jack Russell, Henri Verne, Greta Verne, Werewolf by Night, Topaz, “Scratcher” Martin, Gregory Russoff, Laura Russoff Russell, Werewolf, Shiela Whittier, Trudy Taylor, and Jyota Nital. Every reasonable effort has been made to find and list herein all such material. Nevertheless, if any such material has been omitted, such omission is unintentional and involuntary, and this Notice also applies to each and every such omitted material.

appearing therein, which stories were published and embodied in the comic book issues identified as follows:

<u>Title</u>	<u>Copyright Claimant</u> <sup>3</sup>	<u>Date Copyright Secured</u>	<u>Copyright Reg. No.</u>
<i>Tomb of Dracula</i> Vol. 1, No. 1	Magazine Management Co., Inc. and Marvel Comics Group	10/19/1971	B712603
<i>Tomb of Dracula</i> Vol. 1, No. 2	Magazine Management Co., Inc. and Marvel Comics Group	2/1/1972	B739653
<i>Tomb of Dracula</i> Vol. 1, No. 3	Magazine Management Co., Inc. and Marvel Comics Group	3/28/1972	B744432
<i>Tomb of Dracula</i> Vol. 1, No. 4	Magazine Management Co., Inc. and Marvel Comics Group	5/30/1973	B847506
<i>Tomb of Dracula</i> Vol. 1, No. 5	Magazine Management Co., Inc. and Marvel Comics Group	7/25/1972	B772985
<i>Tomb of Dracula</i> Vol. 1, No. 6	Magazine Management Co., Inc. and Marvel Comics Group	9/26/1972	B787599
<i>Tomb of Dracula</i> Vol. 1, No. 7	Magazine Management Co., Inc. and Marvel Comics Group	11/21/1972	B800163
<i>Tomb of Dracula</i> Vol. 1, No. 8	Marvel Comics Group, a division of Cadence Industries Corp.	1/23/1973	B815059
<i>Tomb of Dracula</i> Vol. 1, No. 9	Marvel Comics Group, a division of Cadence Industries Corp.	2/20/1973	B825207
<i>Tomb of Dracula</i> Vol. 1, No. 10	Marvel Comics Group, a division of Cadence Industries Corp.	3/20/1973	B829682
<i>Tomb of Dracula</i> Vol. 1, No. 11	Marvel Comics Group, a division of Cadence Industries Corp.	4/24/1973	B846942
<i>Tomb of Dracula</i> Vol. 1, No. 12	Marvel Comics Group, a division of Cadence Industries Corp.	5/22/1973	B846899
<i>Tomb of Dracula</i> Vol. 1, No. 13	Marvel Comics Group, a division of Cadence Industries Corp.	6/19/1973	B851838
<i>Tomb of Dracula</i> Vol. 1, No. 14	Marvel Comics Group, a division of Cadence Industries Corp.	7/17/1973	B857134
<i>Tomb of Dracula</i> Vol. 1, No. 15	Marvel Comics Group, a division of Cadence Industries Corp.	8/14/1973	B866425
<i>Tomb of Dracula</i> Vol. 1, No. 16	Marvel Comics Group, a division	9/4/1973	B879205

<sup>3</sup> Pursuant to 37 C.F.R. § 201.10(b)(1)(iii), this Notice of Termination includes the name of at least one author of each Work to which this Notice of Termination applies. The listing herein of any corporation as copyright claimant is done per Copyright Office records, and is not to be construed as an admission that any given work is or was a “work made for hire,” nor is anything else herein to be construed as any such admission. Nothing contained in this Notice of Termination shall be construed to in any way limit or waive any right or remedy that Nanci Solo, Erik Colan and/or Rachel Waldman, may have, at law or in equity, with respect to the subject matter hereof, all of which is hereby expressly reserved.

	of Cadence Industries Corp.		
<i>Tomb of Dracula</i> Vol. 1, No. 17	Marvel Comics Group, a division of Cadence Industries Corp.	9/25/1973	B883969
<i>Tomb of Dracula</i> Vol. 1, No. 18	Marvel Comics Group, a division of Cadence Industries Corporation	10/23/1973	B891716
<i>Tomb of Dracula</i> Vol. 1, No. 19	Marvel Comics Group, a division of Cadence Industries Corporation	11/20/1973	B899455
<i>Tomb of Dracula</i> Vol. 1, No. 20	Marvel Comics Group, a division of Cadence Industries Corporation	1/8/1974	B906646
<i>Tomb of Dracula</i> Vol. 1, No. 21	Marvel Comics Group, a division of Cadence Industries Corporation	2/5/1974	B918332
<i>Tomb of Dracula</i> Vol. 1, No. 22	Marvel Comics Group, a division of Cadence Industries Corporation	3/5/1974	B926664
<i>Tomb of Dracula</i> Vol. 1, No. 23	Marvel Comics Group, a division of Cadence Industries Corporation	5/7/1974	B939804
<i>Tomb of Dracula</i> Vol. 1, No. 24	Marvel Comics Group, a division of Cadence Industries Corporation	6/4/1974	B939782
<i>Tomb of Dracula</i> Vol. 1, No. 25	Marvel Comics Group, a division of Cadence Industries Corporation	6/4/1974	B956177
<i>Tomb of Dracula</i> Vol. 1, No. 26	Marvel Comics Group, a division of Cadence Industries Corporation	7/2/1974	B964044
<i>Tomb of Dracula</i> Vol. 1, No. 27	Marvel Comics Group, a division of Cadence Industries Corporation	9/3/1974	B964074
<i>Tomb of Dracula</i> Vol. 1, No. 28	Marvel Comics Group, a division of Cadence Industries Corporation	9/3/1974	B982110
<i>Tomb of Dracula</i> Vol. 1, No. 29	Marvel Comics Group, a division of Cadence Industries Corporation	10/8/1974	B978710
<i>Tomb of Dracula</i> Vol. 1, No. 30	Marvel Comics Group, a division of Cadence Industries Corporation	11/5/1974	B989057
<i>Tomb of Dracula</i> Vol. 1, No. 31	Marvel Comics Group, a division of Cadence Industries Corporation	12/3/1974	B995431
<i>Tomb of Dracula</i> Vol. 1, No. 32	Marvel Comics Group, a division of Cadence Industries Corporation	1/7/1975	B999523
<i>Tomb of Dracula</i> Vol. 1, No. 33	Marvel Comics Group, a division of Cadence Industries Corporation	2/4/1975	B8139
<i>Tomb of Dracula</i> Vol. 1, No. 34	Marvel Comics Group, a division of Cadence Industries Corporation	4/8/1975	B16961
<i>Tomb of Dracula</i> Vol. 1, No. 35	Marvel Comics Group, a division of Cadence Industries Corporation	4/1/1975	B24311
<i>Tomb of Dracula</i> Vol. 1, No. 36	Marvel Comics Group, a division of Cadence Industries Corporation	4/29/1975	B47240
<i>Tomb of Dracula</i> Vol. 1, No. 37	Marvel Comics Group, a division of Cadence Industries Corporation	6/10/1975	B48651

3. The grant(s) and/or transfer(s) to which this Notice of Termination applies was

(were) made in that (those) certain copyright assignment(s) on the back of the check(s) issued by Marvel Entertainment, LLC's ("Marvel") predecessor company(ies) to Eugene J. Colan, regarding the above-listed Works, which was (were) dated on or about the time of the publication of such Works, as well as any other grant(s) regarding the Works by Eugene J. Colan to Marvel's predecessor(s).<sup>4</sup>

4. The effective date of termination for each respective Work shall be as follows:

<u>Title:</u>	<u>Effective Date of Termination:</u>
<i>Tomb of Dracula</i> Vol. 1, No. 1	October 20, 2027
<i>Tomb of Dracula</i> Vol. 1, No. 2	February 2, 2028
<i>Tomb of Dracula</i> Vol. 1, No. 3	March 29, 2028
<i>Tomb of Dracula</i> Vol. 1, No. 4	May 31, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 5	July 26, 2028
<i>Tomb of Dracula</i> Vol. 1, No. 6	September 27, 2028
<i>Tomb of Dracula</i> Vol. 1, No. 7	November 22, 2028
<i>Tomb of Dracula</i> Vol. 1, No. 8	January 24, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 9	February 21, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 10	March 21, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 11	April 25, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 12	May 23, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 13	June 20, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 14	July 18, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 15	August 15, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 16	September 5, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 17	September 26, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 18	October 24, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 19	November 21, 2029
<i>Tomb of Dracula</i> Vol. 1, No. 20	January 9, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 21	February 6, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 22	March 6, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 23	May 8, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 24	June 5, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 25	June 5, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 26	July 3, 2030


<sup>4</sup> This Notice of Termination also applies to each and every grant or alleged grant by Eugene J. Colan of rights under copyright in and to the Works that falls within the applicable termination time window (defined by 17 U.S.C. § 304(c) and the effective date of this Notice of Termination). Every reasonable effort has been made to find and list herein every such grant and/or transfer. Nevertheless, if any such grant and/or transfer has been omitted, such omission is unintentional and involuntary, and this Notice of Termination applies as well to each and every such omitted grant and/or transfer.

<i>Tomb of Dracula</i> Vol. 1, No. 27	September 4, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 28	September 4, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 29	October 9, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 30	November 6, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 31	December 4, 2030
<i>Tomb of Dracula</i> Vol. 1, No. 32	January 8, 2031
<i>Tomb of Dracula</i> Vol. 1, No. 33	February 5, 2031
<i>Tomb of Dracula</i> Vol. 1, No. 34	April 9, 2031
<i>Tomb of Dracula</i> Vol. 1, No. 35	April 2, 2031
<i>Tomb of Dracula</i> Vol. 1, No. 36	April 30, 2031
<i>Tomb of Dracula</i> Vol. 1, No. 37	June 11, 2031

5. Eugene J. Colan died on June 23, 2011. He is survived by his children, Nanci Solo and Erik Colan, biological grandchild, Rachel Waldman (the daughter of his deceased biological child, Valerie Waldman) and biological child, Jill Kubicki. Together Nanci Solo, Erik Colan and Rachel Waldman constitute more than one-half of Eugene J. Colan's termination interest. Accordingly, this Notice has been signed by all persons needed to terminate the grant(s) identified herein under 17 U.S.C. § 304(c).

Dated: November 15, 2022

TOBEROFF & ASSOCIATES, P.C.



Marc Toberoff

23823 Malibu Road, Suite 50-363  
Malibu, CA 90265  
Tel: (310) 246-3333

As counsel for and on behalf of Nanci Solo,  
Erik Colan and Rachel Waldman

### CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the foregoing document described as  
NOTICE OF TERMINATION to be served this 15<sup>th</sup> day of November, 2022, by First Class  
Mail, postage prepaid, upon each of the following:

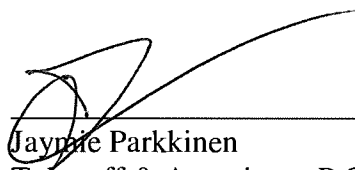
To: Marvel Entertainment, LLC  
Marvel Worldwide, Inc.  
Marvel Property, Inc.  
Marvel Characters, Inc.  
1290 Avenue of the Americas  
New York, NY 10104  
Attn: John Turitzin, Chief Counsel  
Eli Bard, Deputy Chief Counsel

Marvel Studios, LLC  
MVL Rights, LLC  
MVL Development, LLC  
Marvel Characters, Inc.  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: David Galluzzi, Chief Counsel

The Walt Disney Company  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: Alan Braverman, General Counsel

Marvel Animation Inc.  
623 Circle Seven Drive  
Glendale, CA 91201  
Attn: Legal Department

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15<sup>th</sup>  
day of November, 2022, at Malibu, California.



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Jaymie Parkkinen  
Toberoff & Associates, P.C.  
23823 Malibu Road, Suite 50-363  
Malibu, CA 90265

Counsel for Nanci Solo, Erik Colan and  
Rachel Waldman



## NOTICE OF TERMINATION

### “CAPTAIN MARVEL”

To: Marvel Entertainment, LLC  
Marvel Worldwide, Inc.  
Marvel Property, Inc.  
Marvel Characters, Inc.  
1290 Avenue of the Americas  
New York, NY 10104  
Attn: John Turitzin, Chief Counsel  
Eli Bard, Deputy Chief Counsel

Marvel Studios, LLC  
MVL Rights, LLC  
MVL Development, LLC  
Marvel Characters, Inc.  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: David Galluzzi, Chief Counsel

The Walt Disney Company  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: Alan Braverman, General Counsel

Marvel Animation Inc.  
623 Circle Seven Drive  
Glendale, CA 91201  
Attn: Legal Department

PLEASE TAKE NOTICE that pursuant to Section 304(c) of the United States Copyright Act (17 U.S.C. § 304(c)) and the regulations issued thereunder by the Register of Copyrights, 37 C.F.R. § 201.10, Nanci Solo and Erik Colan, the children, and Rachel Waldman, the biological grandchild, of the deceased author Eugene J. Colan, hereby terminate all pre-January 1, 1978 exclusive or non-exclusive grants of the transfer or license of the renewal copyright(s) in and to the illustrated comic book stories, featuring the character Captain Marvel (a.k.a. Mar-Vell), authored or co-authored by Eugene J. Colan (a.k.a. Gene Colan), and published in the respective comic book issues listed in paragraph 2 of this Notice, all as set forth below<sup>1</sup>:

1. The names and addresses of the grantees and/or successors in title whose rights are being terminated are as follows: Marvel Entertainment, LLC, Marvel Worldwide, Inc., Marvel Property, Inc., Marvel Characters, Inc., 1290 Avenue of the Americas, New York, NY 10104;

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<sup>1</sup> The terminated grantees listed herein were previously served on June 22, 2021 with a notice of termination under 17 U.S.C. § 304(c) regarding the Works set forth herein below. This alternate notice of termination is served out of an abundance of caution in the event that the prior notice is deemed ineffective.

Marvel Studios, LLC, MVL Rights, LLC, MVL Development, LLC, Marvel Characters, Inc., 500 South Buena Vista Street, Burbank, CA 91521; The Walt Disney Company, 500 South Buena Vista Street, Burbank, CA 91521; and Marvel Animation Inc., 623 Circle Seven Drive, Glendale, CA 91201. Pursuant to 37 C.F.R. § 201.10(d), service of this notice is being made by First Class Mail, postage pre-paid to the above grantees or successors at the addresses shown.

2. The copyrighted work(s) to which this Notice of Termination apply(ies) (individually, the “Work”; collectively, the “Works”) are the illustrated comic book story(ies), featuring the character Captain Marvel (a.k.a. Mar-Vell), authored or co-authored by Eugene J. Colan (a.k.a. Gene Colan),<sup>2</sup> along with all the characters, story elements, and/or indicia appearing therein, which stories were published and embodied in the comic book issues identified as follows:

<u>Title</u>	<u>Copyright Claimant</u> <sup>3</sup>	<u>Date Copyright Secured</u>	<u>Copyright Reg. No.</u>
<i>Marvel Super-Heroes</i> Vol 1, No. 12	Marvel Comics, Inc. and Marvel Comics Group	10/10/1967	B462618

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<sup>2</sup> This Notice of Termination also applies to all material authored or co-authored by Eugene J. Colan (in any and all medium(s), whenever created) that was reasonably associated with the Works and was registered with the United States Copyright Office and/or published within the termination time window, as defined by 17 U.S.C. § 304(c), and the effective date of this Notice of Termination. This Notice of Termination likewise includes any character, story element, or indicia reasonably associated with the Works including, without limitation, Captain Marvel (a.k.a. Mar-Vell), Carol Danvers (a.k.a. Car-Ell), Una, Yon-Rogg, Zarek, the Kree Soldiers, Jeremy Logan, Supreme Intelligence, Sentry 459, Ronan the Accuser, Walter Lawson, Sam Hill, General William Bridges, Walter Lawson, Dorrek VII, Anelle, Machino, Hal Logan, Chester Fenton, Super-Skrull (a.k.a. Kl’rt), the Skrull Emperor, and Namor the Sub-Mariner. Every reasonable effort has been made to find and list herein all such material. Nevertheless, if any such material has been omitted, such omission is unintentional and involuntary, and this Notice also applies to each and every such omitted material.

<sup>3</sup> Pursuant to 37 C.F.R. § 201.10(b)(1)(iii), this Notice of Termination includes the name of at least one author of each Work to which this Notice of Termination applies. The listing herein of any corporation as copyright claimant is done per Copyright Office records, and is not to be construed as an admission that any given work is or was a “work made for hire,” nor is anything else herein to be construed as any such admission. Nothing contained in this Notice of Termination shall be construed to in any way limit or waive any right or remedy that Nanci Solo, Erik Colan and/or Rachel Waldman, may have, at law or in equity, with respect to the subject matter hereof, all of which is hereby expressly reserved.



<i>Marvel Super-Heroes</i> Vol 1, No. 13	Marvel Comics, Inc. and Marvel Comics Group	12/12/1967	B462617
<i>Marvel's Space-Born Superhero! Captain Marvel</i> Vol. 1, No. 1	Marvel Comics, Inc. and Marvel Comics Group	2/8/1968	B462622
<i>Marvel's Space-Born Superhero! Captain Marvel</i> Vol. 1, No. 2	Marvel Comics, Inc. and Marvel Comics Group	3/7/1968	B462631
<i>Marvel's Space-Born Superhero! Captain Marvel</i> Vol. 1, No. 3	Marvel Comics, Inc. and Marvel Comics Group	4/9/1968	B462609
<i>Marvel's Space-Born Superhero! Captain Marvel</i> Vol. 1, No. 4	Marvel Comics, Inc. and Marvel Comics Group	5/9/1968	B462620

3. The grant(s) and/or transfer(s) to which this Notice of Termination applies was (were) made in that (those) certain copyright assignment(s) on the back of the check(s) issued by Marvel Entertainment, LLC's ("Marvel") predecessor company(ies) to Eugene J. Colan, with respect to the above-listed Works, which was (were) dated on or about the time of the respective publication of such Works, as well as any other grant(s) regarding the Works by Eugene J. Colan to Marvel's predecessor(s).<sup>4</sup>

4. The effective date of termination for each respective Work shall be as follows:

<u>Title:</u>	<u>Effective Date of Termination:</u>
<i>Marvel Super-Heroes</i> Vol 1, No. 12	November 16, 2024
<i>Marvel Super-Heroes</i> Vol 1, No. 13	November 16, 2024
<i>Marvel's Space-Born Superhero! Captain Marvel</i> Vol. 1, No. 1	November 16, 2024
<i>Marvel's Space-Born Superhero! Captain Marvel</i> Vol. 1, No. 2	November 16, 2024
<i>Marvel's Space-Born Superhero! Captain Marvel</i> Vol. 1, No. 3	November 16, 2024
<i>Marvel's Space-Born Superhero! Captain Marvel</i> Vol. 1, No. 4	November 16, 2024

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<sup>4</sup> This Notice of Termination also applies to each and every grant or alleged grant by Eugene J. Colan of rights under copyright in and to the Works that falls within the applicable termination time window (defined by 17 U.S.C. § 304(c) and the effective date of this Notice of Termination). Every reasonable effort has been made to find and list herein every such grant and/or transfer. Nevertheless, if any such grant and/or transfer has been omitted, such omission is unintentional and involuntary, and this Notice of Termination applies as well to each and every such omitted grant and/or transfer.

5. Eugene J. Colan died on June 23, 2011. He is survived by his children, Nanci Solo and Erik Colan, biological grandchild, Rachel Waldman (the daughter of his deceased biological child, Valerie Waldman) and biological child, Jill Kubicki. Together Nanci Solo, Erik Colan and Rachel Waldman constitute more than one-half of Eugene J. Colan's termination interest. Accordingly, this Notice has been signed by all persons needed to terminate the grant(s) identified herein under 17 U.S.C. § 304(c).

Dated: November 15, 2022

TOBEROFF & ASSOCIATES, P.C.



Marc Toberoff

23823 Malibu Road, Suite 50-363  
Malibu, CA 90265  
Tel: (310) 246-3333

As counsel for and on behalf of Nanci Solo,  
Erik Colan and Rachel Waldman

### CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the foregoing document described as  
NOTICE OF TERMINATION to be served this 15<sup>th</sup> day of November, 2022, by First Class  
Mail, postage prepaid, upon each of the following:

To: Marvel Entertainment, LLC  
Marvel Worldwide, Inc.  
Marvel Property, Inc.  
Marvel Characters, Inc.  
1290 Avenue of the Americas  
New York, NY 10104  
Attn: John Turitzin, Chief Counsel  
Eli Bard, Deputy Chief Counsel

Marvel Studios, LLC  
MVL Rights, LLC  
MVL Development, LLC  
Marvel Characters, Inc.  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: David Galluzzi, Chief Counsel

The Walt Disney Company  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: Alan Braverman, General Counsel

Marvel Animation Inc.  
623 Circle Seven Drive  
Glendale, CA 91201  
Attn: Legal Department

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15<sup>th</sup>  
day of November, 2022, at Malibu, California.

  
\_\_\_\_\_  
Jaymie Parkkinen  
Toberoff & Associates, P.C.  
23823 Malibu Road, Suite 50-363  
Malibu, CA 90265

Counsel for Nanci Solo, Erik Colan and  
Rachel Waldman.

**NOTICE OF TERMINATION**

**“GUARDIANS OF THE GALAXY”**

To: Marvel Entertainment, LLC  
Marvel Worldwide, Inc.  
Marvel Property, Inc.  
Marvel Characters, Inc.  
1290 Avenue of the Americas  
New York, NY 10104  
Attn: John Turitzin, Chief Counsel  
Eli Bard, Deputy Chief Counsel

Marvel Studios, LLC  
MVL Rights, LLC  
MVL Development, LLC  
Marvel Characters, Inc.  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: David Galluzzi, Chief Counsel

The Walt Disney Company  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: Alan Braverman, General Counsel

PLEASE TAKE NOTICE that pursuant to Section 304(c) of the United States Copyright Act (17 U.S.C. § 304(c)) and the regulations issued thereunder by the Register of Copyrights, 37 C.F.R. § 201.10, Nanci Solo and Erik Colan, the children, and Rachel Waldman, the biological granddaughter, of the deceased author Eugene J. Colan, hereby terminate all pre-January 1, 1978 exclusive or non-exclusive grants of the transfer or license of the renewal copyright(s) in and to the illustrated comic book story entitled “Earth Shall Overcome!” (which story contains the first appearances of the characters Charlie-27, Major Vance Astro, Martinex T’Naga, and Yondu Udonta – collectively, the “Guardians of the Galaxy”), co-authored by Eugene J. Colan (a.k.a. Gene Colan), and published in *Marvel Super-Heroes*, Vol. 1, No. 18, and set forth in connection therewith the following<sup>1</sup>:

1. The names and addresses of the grantees and/or successors in title whose rights are

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<sup>1</sup> The terminated grantees listed herein were previously served on June 22, 2021 with a notice of termination under 17 U.S.C. § 304(c) regarding the Works set forth herein below. This alternate notice of termination is served out of an abundance of caution in the event that the prior notice is deemed ineffective.

being terminated are as follows: Marvel Entertainment, LLC, Marvel Worldwide, Inc., Marvel Property, Inc., Marvel Characters, Inc., 1290 Avenue of the Americas, New York, NY 10104; Marvel Studios, LLC, MVL Rights, LLC, MVL Development, LLC, Marvel Characters, Inc., 500 South Buena Vista Street, Burbank, CA 91521; and The Walt Disney Company, 500 South Buena Vista Street, Burbank, CA 91521. Pursuant to 37 C.F.R. § 201.10(d), service of this notice is being made by First Class Mail, postage pre-paid to the above grantees or successors at the addresses shown.

2. The copyrighted work (the “Work”) to which this Notice of Termination applies is the illustrated comic book story entitled “Earth Shall Overcome!,” (which story contains the first appearances of the characters Charlie-27, Major Vance Astro, Martinex T’Naga, and Yondu Udonta – collectively, the “Guardians of the Galaxy”), co-authored by Eugene J. Colan (a.k.a Gene Colan),<sup>2</sup> and published and embodied in *Marvel Super-Heroes*, Vol. 1, No. 18 (which includes this issue’s cover page), which issue was registered with the U.S. Copyright Office by Perfect Film & Chemical Corp. and Marvel Comics Group on October 15, 1968 under Copyright Registration No. B474875, and includes all the characters, story elements, and/or indicia appearing therein.<sup>3</sup>

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<sup>2</sup> This Notice of Termination also applies to all material authored or co-authored by Eugene J. Colan (in any and all medium(s), whenever created) that was reasonably associated with the Work and was registered with the United States Copyright Office and/or published within the termination time window, as defined by 17 U.S.C. § 304(c), and the effective date of this Notice of Termination. This Notice of Termination likewise includes any character, story element, or indicia reasonably associated with the Work including, without limitation, the Guardians of the Galaxy, Charlie-27, Major Vance Astro, Martinex T’Naga, Yondu Udonta, Charlie-26, Maz, Yur, Drang, the Saturnian Hound-Hawks, and Betina Marsh. Every reasonable effort has been made to find and list herein all such material. Nevertheless, if any such material has been omitted, such omission is unintentional and involuntary, and this Notice also applies to each and every such omitted material.

<sup>3</sup> Pursuant to 37 C.F.R. § 201.10(b)(1)(iii), this Notice of Termination includes the name of at least one author of the Work to which this Notice of Termination applies. The listing herein of any corporation as copyright claimant is done per Copyright Office records, and is not to be construed as an admission that any given work is or was a “work made for hire,” nor is anything else herein to be construed as any such admission. Nothing contained in this Notice of Termination shall be construed to in any way limit or waive


3. The grant(s) and/or transfer(s) to which this Notice of Termination applies was (were) made in that (those) certain copyright assignment(s) on the back of the check(s) issued by Marvel Entertainment, LLC's ("Marvel") predecessor company(ies) to Eugene J. Colan, with respect to the above-listed Work, which was (were) dated on or about the time of the publication of such Work, as well as any other grant(s) regarding the Work by Eugene J. Colan to Marvel's predecessor(s).<sup>4</sup>

4. The effective date of termination of the Work shall be November 16, 2024.

5. Eugene J. Colan died on June 23, 2011. He is survived by his children, Nanci Solo and Erik Colan, biological grandchild, Rachel Waldman (the daughter of his deceased biological child, Valerie Waldman) and biological child, Jill Kubicki. Together Nanci Solo, Erik Colan and Rachel Waldman constitute more than one-half of Eugene J. Colan's termination interest. Accordingly, this Notice has been signed by all persons needed to terminate the grant(s) identified herein under 17 U.S.C. § 304(c).

Dated: November 15, 2022

TOBEROFF & ASSOCIATES, P.C.

  
\_\_\_\_\_  
Marc Toberoff

23823 Malibu Road, Suite 50-363  
Malibu, CA 90265  
Tel: (310) 246-3333

As counsel for and on behalf of Nanci Solo,  
Erik Colan and Rachel Waldman

---

any right or remedy that Nanci Solo, Erik Colan and/or Rachel Waldman, may have, at law or in equity, with respect to the subject matter hereof, all of which is hereby expressly reserved.

<sup>4</sup> This Notice of Termination also applies to each and every grant or alleged grant by Eugene J. Colan of rights under copyright in and to the Work that falls within the applicable termination time window (defined by 17 U.S.C. § 304(c) and the effective date of this Notice of Termination). Every reasonable effort has been made to find and list herein every such grant and/or transfer. Nevertheless, if any such grant and/or transfer has been omitted, such omission is unintentional and involuntary, and this Notice of Termination applies as well to each and every such omitted grant and/or transfer.

### **CERTIFICATE OF SERVICE**


I hereby certify that I caused a true copy of the foregoing document described as  
NOTICE OF TERMINATION: "GUARDIANS OF THE GALAXY" to be served this 15<sup>th</sup> day  
of November, 2022, by First Class Mail, postage prepaid, upon each of the following:

To: Marvel Entertainment, LLC  
Marvel Worldwide, Inc.  
Marvel Property, Inc.  
Marvel Characters, Inc.  
1290 Avenue of the Americas  
New York, NY 10104  
Attn: John Turitzin, Chief Counsel  
Eli Bard, Deputy Chief Counsel

Marvel Studios, LLC  
MVL Rights, LLC  
MVL Development, LLC  
Marvel Characters, Inc.  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: David Galluzzi, Chief Counsel

The Walt Disney Company  
500 South Buena Vista Street  
Burbank, CA 91521  
Attn: Alan Braverman, General Counsel

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15<sup>th</sup>  
day of November, 2022, at Malibu, California.



---

Jaymie Parkkinen  
Toberoff & Associates, P.C.  
23823 Malibu Road, Suite 50-363  
Malibu, CA 90265

Counsel for Nanci Solo, Erik Colan and  
Rachel Waldman